

UNITED STATES DISTRICT COURT

for the

< _____ > DISTRICT OF MASSACHUSETTS _____ >

GEORGE E. KERSEY,

Plaintiff

v.

AVERY DENNISON CORPORATION

Defendant

Civil Action
Jury Demand

FILED
IN CLERKS OFFICE
2020 JUL 27 PM 2:28
U.S. DISTRICT COURT
DISTRICT OF MASS.

COMPLAINT TO OBTAIN PENSION;
AND JURY DEMAND

1. <Statement of Jurisdiction.

a. For federal-question jurisdiction.>

The defendant AVERY DENNISON CORPORATION is a: Foreign Corporation
Identification Number: 951492269 Registered in Massachusetts:03-30-1977 Organized under
the laws of: State: DE Country: USA on: 02-23-1977 The location of the Principal Office has
the Address: 207 GOODE AVENUE 5TH FLOOR, GLENDALE, CA 91203 USA with no
Massachusetts office,

The name and address of the Registered Agent:

C T CORPORATION SYSTEM, 155 FEDERAL STREET STE 700, BOSTON, MA 02110

This action also arises under the United States Constitution; Amendment 5 which
requires that no one be deprived of life, liberty or property without due process, and claims a
jury trial under the Seventh Amendment to the United States Constitution.

a. For diversity jurisdiction.>

The defendant AVERY DENNISON CORPORATION is a citizen of California; the Plaintiff is a current citizen of Rhode Islands and receives mail at P.O. Box 1073 Framingham, Massachusetts 01701

Statement of complaint

<(a) On Contract, Implied Contract and Tort

2. Beginning in 1966 Plaintiff was employed by DENNISON MANUFACTURING COMPANY ("Dennison") in Framingham, Massachusetts as Head of the Dennison Patent Department. His employment continued until 1989.. In the meantime Avery acquired sufficient Dennison shares that is assumed control of Dennison, and subsequently merged with Dennison. The company then became known as Defendant Avery Dennison Corporation in 1991

3. Kersey's employment terminated in 1989

4. When Kersey wanted to receive his pension he called the Avery Dennison Pension Organization and was told that his request for pension would be investigated and referred to corporate, and he would be contacted with the result. There has bee no contact to date so Kersey called corporate and was told that there is no record that Kersey ever worked for Dennison. This is despite the fact that Dennison issued a Job Pass to

Kersey, copy attached as Exhibit 1 which shows Kersey;s picture with the legend: **Dennison
KERSEY GEORGE E. Employee Number 942 Division PATENT**

5. Dennison apparently failed, improperly, to include Kersey on its pension list.

6. Dennison improperly fired Kersey when he reached age 62, and in the resulting litigation Dennison improperly contended that Kersey had not been employee despite having been in charge of the Dennison Patent Department for twenty years.

7. Kersey understands that Avery grants pensions to consultant so that Kersey is eligible for pension under the Avery rules as well.

Demand for Judgment

Therefore, the plaintiff demands judgment against the Defendant granting Kersey his pension rights and further damages in the amounts owed to be determined by a jury, plus interest and costs for the following offenses:

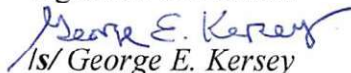
- a.. Failing to respond to Kersey's request for Pension Rights
 - b. Apparently falsely advising Kersey that the matter had been sent to corporate and that Kersey would be advised by corporate.
 - c. Being advised by corporate that it had no record of Kersey ever being associated with Dennison..
 - d. Ignoring the fact that Kersey has a job pass (copy attached to original Complaint as Exhibit 1) showing that that Kersey was Employee 942 of the Dennison PATENT Department.
 - e. Failing to advise Kersey of the corporate decision on his pension request.
- Kersey demands monetary damages and punitive damages.

Jury Demand

Plaintiff Kersey demands a trial by jury on all issues so triable

Date: July 24, 2020

Signature of Plaintiff


/s/ George E. Kersey

<Printed name> George E. Kersey

<Address> P.O. Box 1073,
Framingham, MA 01701

<Telephone number> 518-966-9690

CERTIFICATE OF SERVICE

I hereby certify that this document filed with the Court will be sent via U.S. first class mail to Opposing Counsel

/s/ George Kersey

George Kersey
P.O. Box 1073
Framingham, MA 01701
(518) 966-9690